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Plaintiffs' Liaison Counsel

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION

Case No. 4:22-MD-03047-YGR

MDL No. 3047

This Document Relates to:

Brittany Doffing, 4:22-cv-05892;

Malinda Harris, 4:22-cv-06085;

Ayla Tanton, 4:22-cv-06545;

Megan Waddell, 4:22-cv-05888;

Virginia Roth, 4:22-cv-05884;

Cecelia Tesch, 4:22-cv-06167;

**DECLARATION OF JENNIE LEE
ANDERSON IN SUPPORT OF
PLAINTIFFS' ADMINISTRATIVE
MOTION TO FILE UNDER SEAL
EXHIBITS TO THE SUPPLEMENTAL
DECLARATION OF JENNIE LEE
ANDERSON IN SUPPORT OF
PLAINTIFFS' CONSOLIDATED *EX
PARTE* APPLICATION FOR
APPOINTMENT OF GUARDIANS *AD
LITEM***

Apriel Dorsey, 4:22-cv-06451;
Damian Johnson (and as next of friend to
minors K.L.J., J.A.J., and K.A.J.), 4:22-cv-
06418;
E.W., 4:22-cv-04528;
M.C., 4:22-cv-04529;
T.K., 4:22-cv-04588;
T.R., 4:22-cv-04712;
C.C., 4:22-cv-04709;
J.H. (and as next of friend to minors N.R.
and A.M.), 4:22-cv-04710;
Shaw Jamerson, 4:22-cv-06384;
L.A.T. (and as next of friend to minors P.T.
and L.T.), 4:22-cv-04937;
S.R., 4:22-cv-06455;
Andrea Harrison, 4:22-cv-06452;
Bethany Odems, 4:22-cv-06440;
Sabrina Huff-Young, 4:22-cv-06430;
Luvonia Brown, 4:22-cv-06668;
Tabitha Quinones, 4:22-cv-06431;
Shanetta Kimber (and as next friend to minor
D.K.), 4:22-cv-06434;
Mandy S. Westwood, 4:22-cv-06461;
Robert Turgeon, 4:22-cv-06616;
Angela Canche, 4:22-cv-06449;
Bernard Cerone, 4:22-cv-06417;
Jennifer Koutsouftikis, 4:22-cv-06643;

1 *T.S.*, 4:22-cv-06454;
2 *Chad Smith*, 4:22-cv-06421;
3 *Stoudemire (on behalf of De'John*
4 *Davidson)*, 4:22-cv-06495;
5 *Stoudemire (on behalf of Ja'Taasha*
6 *Davidson)*, 4:22-cv-05987;
7 *Tiffany Woods*, 4:22-cv-6591;
8 *V.P.*, 4:22-cv-06617;
9 *J.O.*, 4:22-cv-05546;
10 *Rossana Agosta*, 4:22-cv-05565;
11 *M.F., B.F., A.F.*, 4:22-cv-05573;
12 *Nicholas Calvoni*, 4:22-cv-05873;
13 *Dayna Page*, 4:22-cv-06124;
14 *Sarie Neave*, 4:22-cv-06126;
15 *Julie Kosiorek*, 4:22-cv-06142;
16 *Zakey Amacker*, 4:22-cv-06150;
17 *Tracy Hunt*, 4:22-cv-06155;
18 *Tamesha Hicks*, 4:22-cv-06162;
19 *D.D., G.D.*, 4:22-cv-06190;
20 *Amanda Duke*, 4:22-cv-06200;
21 *Danielle Cohen*, 4:22-cv-06207;
22 *Kenisha Day*, 4:22-cv-06215;
23 *I.A.*, 4:22-cv-06252;
24 *Margit LaBlue*, 4:22-cv-06256;
25 *Khymberly Levin*, 4:22-cv-06263;
26 *Christian Brooks*, 4:22-cv-06308;
27 *Michelle Wheeldon*, 4:22-cv-06306;
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Jessica Bright, 4:22-cv-06318;
Rachelle Capka, 4:22-cv-06583;
Lawanda Simpson, 4:22-cv-06587;
Jeffrey Wombles, 4:22-cv-06685;
Melanie Clarke-Penella, 4:22-cv-06692;
Lorine Hawthorne, 4:22-cv-06751;
Chris J. Czubakowski, 4:22-cv-06989;
C.U., 4:22-cv-07347;
N.W., 4:22-cv-08937;
David Hemmer, 4:23-cv-00055;
C.N., 4:22-cv-04283;
Star Wishkin, 4:22-cv-06459;
Donna Copelton, 4:22-cv-06165;
Diane Williams, 4:22-cv-05886;
J.A., K.L., and A.L., 4:23-cv-00515;
G.W., 4:23-cv-00545;
Elizabeth Mullen, 4:23-cv- 00600;
A.C., 4:23-cv-00646;
D.D., J.D., 4:22-cv-06205;
Jessica Guerrero, 4:22-cv-05894;
Stephanie Carter, 4:22-cv-05986;
Kelli Cahoon, 4:22-cv-06117;
Kim Isaacs, 4:22-cv-05885;
Edyta Lee, 4:22-cv-06426;
Shanetta Kimber (I), 4:22-cv-06498;
Debra Hudson, 4:22-cv-06296;
Veronica Hicks, 4:22-cv-06627;

Donavette Ely, 4:22-cv-06067

I, Jennie Lee Anderson, do hereby declare and state as follows:

1. I am a partner with the law firm of Andrus Anderson LLP. I am duly admitted to practice before the courts of the State of California and in the Northern District of California. I am the Court-appointed Liaison Counsel for Plaintiffs in *In re Social Media Adolescent Addiction/Personal Injury Products Litigation*, Case No. 4:33-MD-03047, and a counsel of record for the Plaintiff in *Rodriguez v. Meta Platforms, Inc., et al.*, Case No. 4:22-cv-00401. I make this declaration of my own personal knowledge and, if called as a witness, I could and would testify competently to the matters stated below.

2. I make this declaration in support of Plaintiffs' Administrative Motion to File Under Seal Exhibits to the Supplemental Declaration of Jennie Lee Anderson in Support of Plaintiff's Consolidated *Ex Parte* Application for Appointment of Guardian *Ad Litem* ("Administrative Motion to Seal").

3. For the reasons set forth in Plaintiffs' Administrative Motion to Seal filed herewith, Plaintiffs seek to seal the Revised Exhibits attached to the Declaration of Jennie Lee Anderson in Support of Plaintiffs' Consolidated *Ex Parte* Application for Appointment of Guardians *Ad Litem* ("Anderson Supplemental Declaration").

4. True and correct copies of the following Revised Exhibits to the Support of Anderson Supplemental Declaration are as follows and filed herewith:

- a. *Doffing v. Meta Platforms, Inc., et al.*, 4:22-cv-05892 (Revised Exhibit 1);
- b. *Tanton v. Meta Platforms, Inc., et al.*, 4:22-cv-06545 (Revised Exhibit 3);
- c. *Waddell v. Meta Platforms, Inc., et al.*, 4:22-cv-05888 (Revised Exhibit 4);
- d. *Johnson (and as next of friend to minors K.L.J., J.A.J., and K.A.J.) v. Meta Platforms, Inc., et al.*, 4:22-cv-06418 (Revised Exhibits 8, 9 and 10);
- e. *T.K. v. Meta Platforms, Inc., et al.*, 4:22-cv-04588 (Revised Exhibit 13);
- f. *C.C. v. Meta Platforms, Inc., et al.*, 4:22-cv-04709 (Revised Exhibit 15);

- g. *Jamerson v. Meta Platforms, Inc., et al.*, 4:22-cv-06384 (Revised Exhibit 18);
- h. *Woods v. Meta Platforms, Inc., et al.*, 4:22-cv-6591 (Revised Exhibit 36);
- i. *J.O. v. Meta Platforms, Inc., et al.*, 4:22-cv-05546 (Revised Exhibit 38);
- j. *Agosta v. Meta Platforms, Inc., et al.*, 4:22-cv-05565 (Revised Exhibit 39);
- k. *M.F., B.F., A.F. v. Meta Platforms, Inc.*, 4:22-cv-05573 (Revised Exhibit 40);
- l. *Calvoni v. Meta Platforms, Inc., et al.*, 4:22-cv-05873 (Revised Exhibit 41);
- m. *Amacker v. Meta Platforms, Inc., et al.*, 4:22-cv-06150 (Revised Exhibit 45);
- n. *Hicks (Tameshia) v. Meta Platforms, Inc., et al.*, 4:22-cv-06162 (Revised Exhibit 47);
- o. *Levin v. Meta Platforms, Inc., et al.*, 4:22-cv-06263 (Revised Exhibit 54);
- p. *Wheeldon v. Meta Platforms, Inc., et al.*, 4:22-cv-06306 (Revised Exhibit 56);
- q. *Wombles v. Meta Platforms, Inc., et al.*, 4:22-cv-06685 (Revised Exhibit 60);
- r. *Clarke-Penella v. Meta Platforms, Inc., et al.*, 4:22-cv-06692 (Revised Exhibit 61);
- s. *Williams v. Meta Platforms, Inc., et al.*, 4:22-cv-05886 (Revised Exhibit 67);
- t. *Copelton v. Meta Platforms, Inc., et al.*, 4:22-cv-06165 (Revised Exhibit 68);
- and
- u. *G.W. v. Snap, Inc.*, 4:23-cv-00545 (Revised Exhibit 70).

5. Pursuant to Civil Local Rule 7-11, I contacted Liaison Counsel for Defendants on March 24, 2023, to ask Defendants to stipulate that these documents may be filed under seal. Liaison Counsel confirmed that Defendants will so stipulate, but do not waive, and expressly reserve, their right to seek an order or orders in the future to unseal individual applications and/or require parents who wish to proceed pseudonymously going forward make a showing of good cause.

I declare under penalty of perjury pursuant to the laws of the United States of America that the foregoing is true and correct.

Dated: March 24, 2023

Respectfully submitted,

/s/Jennie Lee Anderson
 Jennie Lee Anderson
 Plaintiffs' Liaison Counsel

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